

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

R.S. BASSMAN, Derivatively on Behalf of FREDDIE
MAC a/k/a Federal Home Loan Mortgage Corporation
and its shareholders,

Plaintiff,

V.

RICHARD F. SYRON, PATRICIA L. COOK,
ANTHONY S. PISZEL, EUGENE M. McQUADE,
RICHARD KARL GOELTZ, STEPHEN A. ROSS,
SHAUN F. O'MALLEY, ROBERT R. GLAUBER,
BARBARA T. ALEXANDER, WILLIAM M.
LEWIS, JR., JEFFREY M. PEEK, GEOFFREY T.
BOISI, RONALD F. POE, WASHINGTON
MUTUAL, INC., PRICEWATERHOUSECOOPERS,
LLP, KERRY K. KILLINGER, ANTHONY R.
MERLO, JR., FIRST AMERICAN CORPORATION,
FIRST AMERICAN EAPPRAISEIT,
COUNTRYWIDE FINANCIAL CORPORATION,
COUNTRYWIDE HOME EQUITY LOAN TRUST,
COUNTRY-WIDE BANK, FSB, COUNTRYWIDE
HOME LOANS, INC., LANDSAFE, INC., and
ANGELO R. MOZILO

Defendants,

and

FREDDIE MAC a/k/a Federal Home Loan Mortgage Corporation,

Nominal Defendant.

ECF CASE

Case No. 08-CV-02423 (BSJ) (JCF)

**JOINDER IN FREDDIE MAC'S
MEMORANDUM OF LAW IN
OPPOSITION TO
APPLICATION TO TAKE
DISCOVERY**

Defendants Countrywide Financial Corporation, Countrywide Home Equity Loan Trust, Countrywide Bank FSB, Countrywide Home Loans, Inc., Landsafe, Inc., and Angelo R. Mozilo (the “Countrywide Defendants”), by and through their undersigned counsel, respectfully join in Freddie Mac’s Memorandum of Law in Opposition to Application to Take Discovery filed by Nominal Defendant Freddie Mac on August 22, 2008.

Respectfully submitted,

**COUNTRYWIDE FINANCIAL
CORPORATION, COUNTRYWIDE HOME
EQUITY LOAN TRUST, COUNTRYWIDE
BANK FSB, COUNTRYWIDE HOME
LOANS, INC., LANDSAFE, INC., and
ANGELO R. MOZILO**

By their attorneys,

/s/ Jeffrey A. Simes

Jeffrey A. Simes (JS-7060)
jsimes@goodwinprocter.com
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
(212) 813-8800

Brian E. Pastuszenski (*admitted pro hac vice*)
bpastuszenski@goodwinprocter.com
Stuart M. Glass (*admitted pro hac vice*)
sglass@goodwinprocter.com
Stacey S. Baron (*admitted pro hac vice*)
sbaron@goodwinprocter.com
GOODWIN PROCTER LLP
53 State Street
Boston, MA 02109
(617) 570-1000

CERTIFICATE OF SERVICE

I, Stacey S. Baron, hereby certify that this document was filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 22, 2008.

/s/ Stacey S. Baron